(Office Action, p. 6-7). Therefore, it is Applicants' understanding that the Examiner intended to reject claims 13-17 and 25-27 over Keane.

As a preliminary matter, Applicants note that the publication date of Keane (March 11, 2004) is later than the filing date of the present Application, and the earliest filing date of Keane, the filing date of the parent Application (April 25, 2000), is later than the priority date (April 19, 2000) of the present Application.

Therefore, without commenting on the substantive merits of the Examiner's rejections,

Applicants are hereby traversing the prior art rejections of Claims 1-27 by perfecting their claim to foreign priority.

Applicants are perfecting their claim to priority by filing herewith a verified English translation of priority document JP 2000-117975 with the U.S. Patent and Trademark Office, thereby removing Keane as a reference against the application.

Applicants respectfully request that the rejections of the current claims be reconsidered and withdrawn.

## Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

**RESPONSE UNDER 37 C.F.R. § 1.111** 

U.S. Application No. 09/828,889

Q63958

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

Registration No. 55,470

SUGHRUE MION, PLLC

Telephone: (202) 293-7060 Facsimile: (202) 293-7860

 $\begin{array}{c} \text{washington office} \\ 23373 \\ \text{customer number} \end{array}$ 

Date: December 14, 2005